

ALLEN & OVERY

VIA EMAIL

Hon. Katherine B. Forrest
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
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New York, New York 10007-1312

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October 2, 2013


Re: SEC v. Fabrice Tourre, Case No. 10-cv-3229 (KBF)

Dear Judge Forrest:

We represent Fabrice Tourre in the above-referenced litigation.

We enclose herewith proposed errata for the trial transcript in this matter, and respectfully request that the Court approve this errata sheet. The SEC does not object to this request.

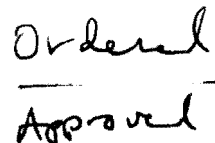
Respectfully submitted,


Pamela Rogers Chepiga

Enclosure

Copy via email: John P. Coffey

Matthew Martens, SEC
Richard Simpson, SEC
Christian Schultz, SEC
Bridget Fitzpatrick, SEC



10/3/13 

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SEC v. Tourre
10-cv-3229 (KBF)

Trial Transcript Errata

Testimony of Dwight Jaffee

Page:Line	Transcript	Corrected Testimony
116:11	Emery	Emory
117:9	a	A
117:13	security	securities
119:16	basis	basics
119:19	losings	loses
120:11	I don't believe so the.	I don't believe so.
122:7	do	did
122:10	it	I
130:18	high	highest
131:20	failed	fail
134:14	Triple D	Triple B
142:11	principal	principle
145:25	security	securities
149:24	investors that cash CDO	investors in that cash CDO
149:25	worth independent	word interest
158:3	started	stated
159:20	principal	principle
161:6	notice	note is
161:10	investor	investment
197:9	fires	fire
214:24	tranches	tranche
228:24	principal	principle
237:4	restless	reckless
265:11	stocker	Stoker
265:22	BP	BB
270:15	set	said
292:19-22	Q. Yes. In that case...They make money?	Q. Yes. A. In that case...of their principal eventually. Q. They make money?

Testimony of Sihan Shu

Page:Line	Transcript	Corrected Testimony
311:8	Blissu	Bissu
314:6	THE WITNESS	MR. SCHULTZ
318:15	plagues	place
334:9	Raazy	Raazi
349:4	going	growing
349:5	digit	digits
350:17	by	buy
352:15	single-named	single-name
353:1	single-named	single-name
353:7	single-named	single-name
354:16	Swiss	Suisse
354:24	log	long
356:18	single-named	single-name
359:9	ways	with
360:9	net to carry	net carry
360:12	net to carry	net carry
362:13	service	servicer

Testimony of Paolo Pellegrini

Page:Line	Transcript	Corrected Testimony
399:12	by	buy
399:23	“the start deals”	the “start” deals
403:24	superior	super
406:6	give	the
411:6	can	you
421:25	Mat	Matt
427:7	Mat	Matt
437:6	manipulator	manipulated
439:8	a	an
439:9	the not	not
446:6	Egol	Egol
485:13	this is a the	this is the
501:8	ABX	ABS
501:21	ABX	ABS
502:3	ABX	ABS
503:10	ABX	ABS
503:16	ABX	ABS
503:22	ABX	ABS
504:11	you can heard	you can be heard
506:2	8033	803(3)

Page:Line	Transcript	Corrected Testimony
506:11	ABX	ABS
507:2	Jacksonville	Jackson Hole
517:7	injury	jury
544:14	Q.	[delete "Q."(continuation of answer)]
572:21	on	or
591:15	what you I think	what I think
593:1	take	tape

Testimony of Jonathan Egol

Page:Line	Transcript	Corrected Testimony
665:6	ABX	ABS
665:7	ABX	ABS
665:10	ABX	ABS
665:11	ABX	ABS
670:25	link	linked
704:19	link	linked
789:9	know	now
823:19	collateralize	collateralized
828:9	your	our
854:20	present	Mr.
858:19	who	how
876:3	inwind	unwind
888:9	supposed	to port
893:19	were	are
934:11	work corps	mortg corr
934:13	MPGCOR	Mtgcrr
938:3	buy	by
948:25	argaret	Margaret
949:11	Jsoh	Josh
976:2	adversed	adverse
1031:19	likely	lightly
1037:25	g	vetoed

Testimony of Gail Kreitman

Page:Line	Transcript	Corrected Testimony
1076:14	any	and a
1079:9	were	with
1211:2	Mr. Schultz	The Court
1243:13	that was	that he was
1312:15	we'd	we

Testimony of Laura Schwartz

Page:Line	Transcript	Corrected Testimony
1499:21	or	other
1584:5	McCabe	McCabe
1626:11	bind	buy
1631:5	is	has
1643:1	RMBS's	RMBS as
1657:7	on	and
1658:21	times	tapes
1667:23	referenced	reference
1673:3	backs	backed
1726:2	wet	yet
1744:14	investor	investment
1883:6	recommitted	precommitted
1894:1	had	hadn't

Testimony of Alan Roseman

Page:Line	Transcript	Corrected Testimony
1361:23	and	in
1371:25	moreover	more over
1380:6	surety	short
1384:2	ensuring	insuring
1466:13	CEO	CDO
1469:16	butch bunch	bunch

Testimony of Fabrice Tourre

Page:Line	Transcript	Corrected Testimony
1911:8	reconciliation	reference obligations
1935:9	two	too
1948:19	"I really know"	"I don't really know"
1953:15	structured	structure
1968:14	ACA's	ACA as
1969:8	Saturday	Asset
1984:8	an	and
2061:17	IT	my team
2089:22	AC	ACA
2095:10	Eddie	David
2096:11	Eddie	David
2099:5	so	show
2143:15	this stress	distressed
2193:15	York	Jorg
2200:13	2010	2007
2205:2	309	30
2205:12	309	30
2224:23	on	are
2373:10	Ms. Chepiga	Mr. Martens

Rule 50 Motions / Charge Conference / Summations / Charge

Page:Line	Transcript	Corrected Testimony
2388:10	do	to
2406:20	I. Don't	I don't
2423:12	AaaAAA	Aaa and AAA
2437:10	Judge	judge
2441:18	tote sheet	term sheet
2443:14	about	above
2448:3	debt	desk
2449:3	Paulson	Paulson's
2449:7	processions	processes
2452:25	selected	"selected"
2453:16	senior term sheet	term sheet
2453:17	ACA	ABN
2454:12	their	the
2455:24	and	for
2457:2	said, as to	said. As to
2463:25 ¹	Naftal	Naftalin
2504:17	hear	here

¹ Both occurrences of the word "Naftal" in line 2463:25 should be changed to "Naftalin."

Page:Line	Transcript	Corrected Testimony
2506:13	is entitled	is not entitled
2506:19	taken position	taken the position
2507:1-2	to act is supported by case law.”	to act” is supported by case law.
2507:13	aware of any aware of any	aware of any
2507:25	went	when
2508:22	“conduct in effect.”	conduct and effects.
2509:2	offering sale	offer and sale
2514:6	may	my
2515:12	stat	sat
2629:7	the tainting	tainting the
2629:11	party, she	party was, she
2639:5	at a time	at the time
2651:8	come	coming
2657:22	from an ACA’s	from ACA’s
2666:18 and 2666:23	Botnick	Bautnecht
2679:1	interest, hands aren’t lined	interests aren’t aligned
2681:12	may call	Non-call
2685:19	somebody is	is somebody
2688:1	information	trading
2689:16	2007	2013
2700:20	this one	none
2705:17- 18	ask as so much for an email.	ask for so much as an email.
2707:4	MR. MARTENS:	MR. COFFEY:
2709:4	he did well. x	he did well.
2710:20	don’t call up	don’t you call up
2712:20	be a coextensive	be coextensive
2713:16	not a part	not a party
2714:2	was a TIAA-CREF	was at TIAA-CREF
2718:19	MS. CHEPIGA:	MR. COFFEY:
2724:24	Little dents.	A little dense.
2778:11	Subparts (1,	Subparts (1),
2789:6	mother money or property	money or property
2794:17	definitions initials	initial definitions
2798:1	won	one
2805:15	aided an abetted	aided and abetted
2826:11	going answer	going to answer